UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE "A MILLION LITTLE PIECES" LITIGATION

No. 06-md-1771

Hon. Richard J. Holwell

NOTICE OF AMLP PLAINTIFFS' GROUP'S MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND APPROVAL OF NOTICE PLAN

PLEASE TAKE NOTICE that, upon the Stipulation of Agreement of Settlement and the exhibits annexed thereto, and all other papers and proceedings herein, the *A Million Little Pieces* Plaintiffs' Group, on behalf of themselves, and all persons who purchased the book *A Million Little Pieces* (the "Class Members"), on or before January 26, 2006 (the "Class Period"), by and through their proposed Interim Co-Counsel, will move this Court pursuant to F.R.C.P. 23, before the Honorable Richard J. Holwell, located in Courtroom 17B, 500 Pearl Street, New York, New York, 10007, on January 26, 2007 at 9:00 A.M., or as soon as counsel may be heard, for an Order granting Preliminary Approval to the Proposed Settlement pursuant to the terms of the Settlement Agreement dated January 2, 2007. Oral argument is requested only in the event there is opposition to this motion filed.

Dated: January 4, 2007 Respectfully submitted,

LAW OFFICES OF THOMAS M. MULLANEY

By:/s/ Thomas M. Mullaney (TM4274)

Thomas M. Mullaney, Esquire 708 Third Avenue, Suite 2500

New York, NY 10017

Telephone: (212) 223-0800 Facsimile: (212) 661-9860 *Liaison Counsel for Class and*

Attorneys for Plaintiff Diane Marolda

[Additional Counsel Appear on Next Page]

BRODSKY & SMITH, LLC

By: /s Evan J. Smith, Esquire (ES3254) Evan J. Smith, Esquire (ES3254) 240 Mineola Blvd. Mineola, NY 11501

(516) 741-4977 Telephone: Facsimile: (516) 741-0626

[Proposed] Co-Interim Class Counsel and Attorneys for Plaintiff Michele Snow

Larry D. Drury, Esquire (admitted *pro hac vice*) Larry D. Drury, Ltd. 205 W. Randolph Street, Suite 1430 Chicago, IL 60606

Telephone: (312) 346-7950 Facsimile: (312) 346-5777

[Proposed] Co-Interim Class Counsel and Attorneys for Plaintiff Marcia Vedral

John H. Alexander, Esquire John H. Alexander & Associates, LLC 100 West Monroe, 21st Floor Chicago, IL 60602

Attorney for Plaintiff Marcia Vedral

Alan S. Ripka, Esquire Napoli Bern Ripka 115 Broadway New York, NY 10006

Attorney for Plaintiff Jimmy Floyd

Thomas E. Pakenas, Esquire Dale and Pakenas 641 Lake Street, Suite 400 Chicago, Il 60661

Attorney for Plaintiff Pilar More

[Additional Counsel Appear on Next Page]

Thomas A. Zimmerman, Jr., Esquire Zimmerman and Associates, P.C. 100 West Monroe, Suite 1300 Chicago, IL 60603

Attorney for Plaintiff Ann Marie Atrack

Michael David Myers, Esquire Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Seattle, WA 98101

Attorney for Plaintiffs Shera Paglinawan and Wendy Shaw

Scott C. Frost, Esquire Statman, Harris, Siegel & Eyrich, LLC 333 West Wacker Drive, Suite 1710 Chicago, IL 60606

Attorney for Plaintiff Jill Giles

Brian C. Witter, Esquire DiTommaso Lubin 17 West 220, 22nd Street Oakbrook Terrace, IL 60181

Attorneys for Plaintiff Sara Brackenrich